

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of:)	
)	
Developing a Unified Inter-carrier)	CC Docket No. 01-92
Compensation Regime)	
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_____)	

**REPLY COMMENTS OF INTEGRA TELECOM, INC. ON PHANTOM
TRAFFIC INTERIM PROCESS AND CALL DETAIL RECORDS PROPOSAL**

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Pursuant to the Federal Communications Commission's ("Commission") Order released December 20, 2006,¹ Integra Telecom, Inc. ("Integra") respectfully submits these reply comments on the proposed interim process to address phantom traffic issues and the related proposal for the creation and exchange of call detail records as submitted to the Commission by the Supporters of the Missoula Plan.

In its opening comments, Integra explained how the proposed plan for dealing with phantom traffic would not actually solve the problem, to the extent one exists, of phantom traffic. Rather, the proposed plan would result in increased burdens on and expenses for the carriers required to purchase call detail records, regardless of whether they want or need them, while also guaranteeing a new revenue stream for transit providers who create the call

¹ *In the Matter of Developing a Unitified Intercarrier Compensation Regime*, Order, DA 06-2548 (rel. Dec. 20, 2006).

detail records. Verizon estimates in its opening comments that a typical tandem office would be required to “generate or process approximately 250% more billing records than are created and distributed today.”² Yet, Verizon accurately observes that “[t]he Missoula supporters have yet to explain why these additional records are necessary or what carriers would even do with them.”³

Integra agrees with Verizon’s statements. The problem with phantom traffic is that it is missing signaling information that is sufficient to allow intermediate and terminating carriers to bill properly for intercarrier compensation. The proposed phantom traffic plan would purport to solve this problem by requiring the creation (and purchase) of more records. Creating more records, however, does not solve the problem of records that are insufficiently or incorrectly populated.

As is reflected in the opening comments of Integra and numerous other carriers, the proposed phantom traffic solution would burden competitors with additional costs for which neither they nor the industry would benefit. Since the proposed phantom traffic plan would not solve the problem of phantom traffic and would result in substantially increased costs for carriers, the Commission should reject the proposed plan.

Dated: January 5, 2007

² Verizon opening comments at 12.

³ *Id.*

INTEGRA TELECOM, INC.

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